

## Compliance Assessment Report

Report ID:  
CAR\_NRW0033944

This form will report compliance with your permit as determined by an NRW officer

Site	Abstraction from borehole at Whitchurch Golf Club	Permit Ref	21/57/25/0066			
Operator/Permit holder	Whitchurch (Cardiff) Golf Club					
Regime	Water Abstraction					
Date of assessment	11/09/2018	Time in	14:00	Out	15:00	
Assessment type	Audit					
Parts of the permit assessed	All					
Lead officer's name	Wrangham, Natalie					
Accompanied by	Barrett, Hayley					
Recipient's name/position	Mike Stokes/ Course Manager	Date issued	19/09/2018			

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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**KEY:** See Section 5 for breach categories, suspended scores will be indicated as such.

**A** = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

**O** = Ongoing non-compliance, not scored.

**Number of breaches  
recorded**

0

**Total compliance score**

(see section 5 for scoring scheme)

0

If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Site inspection carried out to assess compliance to conditions of abstraction licence by myself (Natalie Wrangham) and Hayley Barrett. Met with Mike Stokes, Course Manager who accompanied me and my colleague around site. We checked the pump location, and the abstraction meters for the pond fill and spray irrigation licence purposes. All appeared in good working order (see pictures below). No breaches / issues were observed at the time of inspection. Abstraction records in good order (no holding period defined in licence), Mike showed us past 3 years. Abstraction within maximum quantities defined in the licence.



Pond refill meter

Irrigation, 2012

Month Year	Start	Monthly Total	End
APR	11	0341	
MAY	11	2346	
JUN	11	4386	
JUL	11	1128	
AUG	12	429	
SEP	12	269	
OCT			
NOV			
DEC			
JAN			
FEB			
MAR			
End			
Total			

Pond. Fill.

Month Year	Start	Monthly Total	End
APR	37	592	
MAY	38	67	
JUN	40	45	
JUL	42	612	
AUG	43	670	
SEP			
OCT			
NOV			
DEC			
JAN			
FEB			
MAR			
End			
Total			

2018 returns

Spray Irrigation

2017

Month Year	Start	Monthly Total	End
APR	103	984	
MAY	105	226	
JUN	106	601	
JUL	104	536	
AUG	101	116	
SEP	110	117	
OCT			
NOV			
DEC			
JAN			
FEB			
MAR			
End			
Total			

Pond. Fill.

2017

Month Year	Start	Monthly Total	End
APR	34	629	
MAY	35	720	
JUN	36	56	
JUL	33	56	
AUG	33	56	
SEP	32	66	
OCT	32	69	
NOV			
DEC			
JAN			
FEB			
MAR			
End			
Total			

2017 returns

*Spray Irrigation*

Month	Year	2015/16	Monthly Total	Ex
Start		2	2	2
APR		2	2	2
MAY		2	2	2
JUN		2	2	2
JUL		2	2	2
AUG		2	2	2
SEP		2	2	2
OCT		2	2	2
NOV		2	2	2
DEC		2	2	2
JAN		2	2	2
FEB		2	2	2
MAR		2	2	2
End				
Total				

*Pond. F.U.*

Month	Year	2015/16	Monthly Total	Ex
Start		2	2	2
APR		2	2	2
MAY		2	2	2
JUN		2	2	2
JUL		2	2	2
AUG		2	2	2
SEP		2	2	2
OCT		2	2	2
NOV		2	2	2
DEC		2	2	2
JAN		2	2	2
FEB		2	2	2
MAR		2	2	2
End				
Total				

2016 returns

Spoke with Mike about concerns he had regarding licence conditions.

1. Mike requested a copy of the most up to date licence, as he only had a copy of the licence prior to the variation in 1991.
2. Mike confirmed that the golf club no longer abstracts for the Club House purpose (1,000,000 gallons per year) and would like this quantity to be re-allocated to the purpose of spray irrigation / pond refill.

I provided advice that he should consider making an application to vary the licence to have the redundant purpose removed and the water resource allocated to that purpose re-allocated to the other purposes on the licence. I also suggested he may wish to aggregate / consolidate the abstraction quantities to give more flexibility, as he expressed concerns about the on-going dry weather experienced in summer 2018. This will need to be assessed by the Water Resources Permitting Team.

#### Next steps

I will provide Mike with information and forms for an abstraction licence variation and a copy of the up to date licence.

## EPR Compliance Assessment Report

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### Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

### Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

## Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

**See our Enforcement and Civil Sanctions guidance for further information**

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

### Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

## Section 6 – General information

### Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk). If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

#### Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.